

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	CHAPTER 11
	)	Judge Timothy A. Barnes
Natalja Vildziuniene,	)	Case No. 19-22967
	)	
<hr/>		
Natalja Vildziuniene,	)	
	)	
Plaintiff	)	Adv. No. 21-00087
	)	
Kevin P. LaRoe,	)	
	)	
Defendant.	)	

**NOTICE OF MOTION**

TO: ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on **the 2<sup>nd</sup> day of August 2021 at the hour of 1:30 p.m.**, or as soon thereafter as counsel can be heard, I shall appear before the Honorable Timothy A. Barnes, or before any other Judge who may be sitting in his place, and present the **Motion of Plaintiff for Default Judgment Against Kevin P. LaRoe**, a copy of which is attached hereto and herewith served upon you.

**This motion will be presented and heard electronically using Zoom for Government.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

**To appear by video**, (1) use the link: <https://www.zoomgov.com/>. (2) Enter the meeting ID 161 329 5276. (3) Enter the passcode 433658. **Unless otherwise ordered by Judge Barnes, the hearings will be conducted *without* video.**

**To appear by telephone**, (1) CALL Zoom for Government at 1-669-254-5252 or 1-646-828-7666. (2) Enter the meeting ID 161 329 5276. (3) Enter passcode 433658.

**When prompted identify yourself by stating your full name.**

**To reach Judge Barnes's web page** go to [www.ilnb.uscourts.gov](http://www.ilnb.uscourts.gov) and click on the tab for Judges.

**If you object to this motion** and want it called on the presentment date above, you may file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may call the matter regardless.

/s/John H. Redfield  
Crane, Simon, Clar & Goodman  
135 S. LaSalle, Suite 3950  
Chicago, IL 60603  
(312) 641-6777

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	CHAPTER 11
	)	Judge Timothy A. Barnes
Natalja Vildziuniene,	)	Case No. 19-22967
	)	
<hr/>		
Natalja Vildziuniene,	)	
	)	
Plaintiff	)	Adv. No. 21-00087
	)	
Kevin P. LaRoe,	)	
	)	
Defendant.	)	

**CERTIFICATE OF SERVICE**

The undersigned, being first duly sworn on oath deposes and states that he caused a copy of the foregoing Notice and attached Motion to be served on all parties listed on the attached Service List via the Court's Electronic Registration (ECF) (where indicated), via Facsimile or email (where indicated) or via First Class U.S. Mail (where indicated), and properly addressed and postage pre-paid on the 23<sup>rd</sup> of July 2021.

/s/John H. Redfield

Via ECF  
Patrick S. Layng  
[USTPRegion11.ES.ECF@usdoj.gov](mailto:USTPRegion11.ES.ECF@usdoj.gov)

James J Ayres Law Offices, Ltd.  
[James@AyresLawLtd.com](mailto:James@AyresLawLtd.com)

Kevin Besetzny  
[kbesetzny@besetznylaw.com](mailto:kbesetzny@besetznylaw.com)

Jennifer M Rinn  
[Jennifer@rinnrichmanlaw.com](mailto:Jennifer@rinnrichmanlaw.com)

Amir R Tahmassebi  
[amir@konicekdillonlaw.com](mailto:amir@konicekdillonlaw.com)

Jeffrey Snell [jeffrey.snell@usdoj.gov](mailto:jeffrey.snell@usdoj.gov)

Bradley Block  
[brad.block@bradblocklaw.com](mailto:brad.block@bradblocklaw.com)

Jonathan D. Golding  
[jgolding@goldinglaw.net](mailto:jgolding@goldinglaw.net)

Richard N Golding  
[rgolding@goldinglaw.net](mailto:rgolding@goldinglaw.net)

Cornelius P Brown  
[nbrown@cohonraizes.com](mailto:nbrown@cohonraizes.com)

Carrie A. Dolan  
[cdolan@cohonraizes.com](mailto:cdolan@cohonraizes.com)

Jeffrey D Corso  
[jcorso@ccvmlaw.com](mailto:jcorso@ccvmlaw.com)

Peter C Bastianen  
[bkpleadingsNORTHERN@il.cslegal.com](mailto:bkpleadingsNORTHERN@il.cslegal.com)

Christopher T Smith  
[ctsmith@attorneyctsmith.com](mailto:ctsmith@attorneyctsmith.com)

David DeCelles  
U.S. Attorney's Office  
[david.decelles@usdoj.gov](mailto:david.decelles@usdoj.gov)

Dana N O'Brien  
[dana.obrien@mccalla.com](mailto:dana.obrien@mccalla.com)

Toni Townsend  
[toni.townsend@mccalla.com](mailto:toni.townsend@mccalla.com)

Via Email:  
Natalja Vildziuniene

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	CHAPTER 11
	)	Judge Timothy A. Barnes
Natalja Vildziuniene,	)	Case No. 19-22967
	)	
<hr/>		
Natalja Vildziuniene,	)	
	)	
Plaintiff	)	Adv. No. 21-00087
	)	
Kevin P. LaRoe,	)	
	)	
Defendant.	)	

**MOTION FOR DEFAULT JUDGMENT AGAINST KEVIN P. LaROE**

Natalja Vildziuniene (“Debtor” or “Plaintiff”) by her attorneys, John H. Redfield and Crane, Simon, Clar & Goodman, hereby seeks the entry of an order for Default Judgment Against Kevin P. LaRoe (“LaRoe”), by alleging as follows:

1. The Plaintiff filed an adversary complaint (“Complaint”) to avoid LaRoe’s interests as tenants in common with the Plaintiff regarding the real properties commonly known as 3543 North Plainfield Avenue, Chicago, Illinois 60634 (“Plainfield”); and 3224 North Ottawa Ave., Chicago, Illinois 60034 (“Ottawa”), collectively, (the “Properties”).
2. The Complaint alleges that the deeds from the Plaintiff to the Plaintiff and LaRoe as tenants in common are void because the signatures of the Plaintiff were not genuine and forged. Furthermore, the deeds were not properly notarized because the alleged notary was deceased at the time the deeds were allegedly executed.
3. LaRoe was served with process on or about May 25, 2021 and he appeared at the Court’s status hearing on July 12, 2021.

4. LaRoe has failed to answer or otherwise please to the Complaint.
5. The allegations in the Complaint are deemed admitted when the Defendant fails to answer the Complaint as set forth in Rule 8(b)(6) of the Fed.R.Civ.P.
6. Attached hereto is an Affidavit of the attorney for the Plaintiff in support of the allegations of the Complaint **Exhibit 1**.
7. Also, attached hereto as **Exhibit 2** is an affidavit as to military service of Kevin P. LaRoe.

Wherefore, Natalja Vildziuniene, the Plaintiff and Debtor-in-Possession herein, prays for the entry of an order as follows:

- a. That Kevin P. LaRoe be held in default of the Complaint;
- b. That a default judgment be entered pursuant to Rule 55 of the Fed.R.Civ.P. against Kevin P. LaRoe avoiding his interests in the Properties; and
- c. For such other order as the Court deems just and proper.

Respectfully submitted,

Natalja Vildziuniene, Plaintiff

By: /s/John H. Redfield  
One of her attorneys

**PLAINTIFF'S COUNSEL:**

John H. Redfield (Atty. No. 2298090)  
Crane, Simon, Clar & Goodman  
135 S. LaSalle Street, Suite 3950  
Chicago, Illinois 60603  
312-641-6777

[jredfield@cranesimon.com](mailto:jredfield@cranesimon.com)

W:\JHR\Vildziuniene, Ch.11\Default Agnst LaRoe.MOT.docx

